

**Responses to EPA and UDEQ Concerns Regarding
OU III Work Performed Under Directive 95-04**

Concern

Our position is that the ongoing sampling effort is being conducted in the absence of an approved RI/FS Work Plan. We are unclear as to the overall purpose of the sampling effort. EPA is uncertain as to whether the sampling locations and the number of samples proposed to be collected and analyzed is adequate. DOE is hereby advised that EPA and UDEQ may not consider the results of the sampling effort acceptable. Furthermore, DOE is proceeding at its own risk in the absence of an approved RI/FS Work Plan.

Response

DOE recognizes that work performed in advance of an approved work plan is performed at risk. However, DOE also recognizes that if field work is not largely completed this field season, it will not be possible to meet the expedited schedule outlined in the September 1995 Draft Final Work Plan. To reduce the risk associated with performing work in advance of an approved work plan, DOE has kept the EPA and UDEQ informed through meetings and teleconferences as to the nature of the work being performed.

DOE agrees that the overall purpose of sampling efforts needs to be clearly stated in directives. The purpose of the sampling effort proposed under Directive No. 95-05 will be clearly specified in the directive.

Concern

Without knowing the data quality objectives of the ongoing sampling activity we are uncertain as to the usefulness of the proposed sampling and analysis.

Response

The data quality objectives associated with sediment sampling in support of the ecological and human health risk assessments are discussed in Sections 4.5.4.1 and 4.6.4.1, respectively, of the March 1995 Revised Draft and September 1995 Draft Final OU III RI/FS Work Plan. All work performed under Directive No. 95-04 was completed in accordance with the March 1995 Revised Draft Work Plan, except as amended by the directive. Similarly, all work to be performed under Directive No. 95-05 will be completed in accordance with the September 1995 Draft Final Work Plan, except as amended by the directive.

Concern

EPA cautions DOE that results obtained from the limited sampling, only one beaver pond, may not be adequate to determine the nature and extent of contamination.

Response

Gamma logging and sediment sampling were performed at the one irrigation pond and two beaver ponds located along upper Montezuma Creek during the August 1995 event. The additional work to be performed under Directive 95-05 includes gamma logging at low-velocity reaches/ponded areas along upper Montezuma Creek and at beaver ponds and low-velocity reaches along lower Montezuma Creek. Additional sediment sampling will be performed under Directive 95-05 if warranted based on gamma-logging results.

Concern

EPA does not have assurance of the QA/QC proposed to be used. No chain of custody has been proposed and no connection to the Field Sampling Plan is apparent.

Response

Directives 95-04 and 95-05 were prepared to document scope of work and/or procedural revisions to original project planning documents, without reiteration of unrevised material. Directive 95-04 documents revisions to the March 1995 revised draft planning documents. Directive 95-05 documents revisions to the September 1995 draft final planning documents. No revisions to quality assurance/quality control (QA/QC) or chain of custody protocols are documented in Directives 95-04 and 95-05. Therefore, work is performed under the Directives in accordance with the QA/QC and chain of custody protocols specified in the planning documents.

Concern

Observations of the sampling effort at the Adams pond suggested that the existing equipment and the sampling technique is inadequate. In particular, we are concerned about the percentage of core recovery.

Response

DOE has purchased a superior core-barrel type sampling device, with appropriate accessories, for use in the follow-up sediment sampling program proposed in Directive 95-05. DOE maintains that good recovery of undisturbed, continuous cores is a desired, although very optimistic goal; however, use of the improved sampling equipment cannot guarantee ideal core recovery because of the fine-textured, saturated, and loose nature of sediments encountered in the ponds.

Concern

We are also concerned that contamination (heavy metals and tailings) may have been deposited at discrete time intervals, in layers that have been deposited or interspersed between layers of reasonably clean material.

Response

DOE agrees that contamination may be present in discrete layers. For that reason, total-count gamma logging of sediment profiles was proposed in Directive 95-04, and performed during August 1995. Five locations in the irrigation pond, three locations in the upper beaver pond, and three locations in the beaver pond at the swallow sampling site were logged. At each location the bottom of the pond sediment profile was encountered. Preliminary gamma-logging results obtained during the August 1995 event (included as an attachment to Directive 95-05) do not indicate that discrete layering of apparently contaminated and uncontaminated sediment layers is present in the pond sediments. A detailed explanation of gamma-logging equipment, method, detector range, detector sensitivity, and signal processing are presented in the Draft Final Field Sampling Plan (September 1995).

Concern

EPA and UDEQ are also concerned that compositing of the (core) sample may not be appropriate. If discrete layering is evident, the study approach may want to address this.

Response

Compositing samples over 2-foot intervals was performed during the August 1995 event to ensure that sufficient sample volumes could be obtained for laboratory analysis. However, DOE anticipates better core recovery with use of the new sampling equipment discussed above, and therefore, proposes to collect samples over a one-foot interval under Directive 95-05.



CONTRACT NO.: DE-AC13-96GJ87335
TASK ORDER NO.: MAC00-03
CONTROL NO.: 3100-N/A

MEMO TO: Distribution
FROM: K.L. McClellen^{KLM}
DATE: April 28, 2000
SUBJECT: Program Directives MSG-99-01 and MSG-99-02 are Discontinued

This memorandum is being issued to revise the expiration dates of Program Directives MSG-99-01 and MSG-99-02. Effective immediately these directives are no longer active.

The expiration date of Directive MSG-99-01 issued July 19, 1999 was extended indefinitely through the issuing of Directive MSG-99-02 issued on September 13, 1999 with a September 30, 2000 expiration date. The information contained in each of these directives has been incorporated, as appropriate, in the December 1999 revision to the Interim Remedial Action Surface Water and Ground Water Monitoring Plan (MAC-MSGRAP 1.3.5-1), Revision 3.

/fp

Distribution:

cc: Project Record File MRAP 1.3.5 through J. Glasgow
Task Order Managers Directive Log
~~MSG Administrative Record (2 copies through C. Kelleher)~~
Document Holders:
T. Bartlett
S. Campbell
R. Hopping
K. McClellen
~~D. Miller~~
F. Pearl
J. Berwick (DOE-GJO 2 copies)
P. Mushovic (EPA 2 copies)
D. Bird (UDEQ 2 copies)



4-28 (3) OUIII AR 576a

U.S. Department of Energy

Grand Junction Office
2597 B94 Road
Grand Junction, CO 81503

MAR 20 2001

Mr. Paul Mushovic
Environmental Protection Agency, Region 8
Suite 500 Mail Stop 8HWM-FF
999 18th Street, Denver Place
Denver, CO 80202-2405

Mr. David Bird
State of Utah Department of Environmental Quality
Division of Environmental Response and Remediation
168 North 1950 West
Salt Lake City, UT 84116

Subject: Monticello PeRT Wall Activities, MSG *Program Directive* MSG-01-02

Dear Mr. Mushovic and Mr. Bird:

Enclosed is the revised *Program Directive* that incorporates your comments received during the FFA meeting last week. Specifically, monitoring wells PW-18, PW-20, PW-22, PW-16, PW-14, PW-10, and PW-23 will be retained as part of the monitoring network, and wells will be converted to flush mount consistent with the landowner's preference. The DOE intends to abandon wells near the PeRT Wall as soon as weather allows and would appreciate any final comments on the *Program Directive* as soon as possible.

If you have any questions or concerns, please call me at (970) 248-7612.

Sincerely,

Donald R. Metzler
Technical/Project Manager

Enclosure

cc w/o enclosure:
M. Butherus, MACTEC-ERS
Project Record MSG 1.3.5 (J. Glasgow)
Information Repository (T. Kirkpatrick)

drm\transmit.doc

CONTRACT NO.: DE-AC13-96GJ87335
TASK ORDER NO.: MAC01-01
CONTROL NO.: 3100-T01-0457

March 16, 2001

Project Manager
Department of Energy
Grand Junction Office
2597 B3/4 Road
Grand Junction, CO 81503
ATTN: Mr. Donald R. Metzler

SUBJECT: Contract No. DE-AC13-96GJ87335—Monticello PeRT Wall Activities,
MSG Program Directive MSG-01-02

Dear Mr. Metzler:

Attached are three copies of the revised Program Directive that incorporates EPA and UDEQ comments received during the FFA meeting last week. Specifically, monitoring wells PW-18, PW-20, PW-22, PW-16, PW-14, PW-10, and PW-23 will be retained as part of the monitoring network and wells will be converted to flush mount consistent with the landowner's preference.

MACTEC-ERS intends to abandon wells near the PeRT wall as soon as weather allows. Please forward two copies of the Program Directive to the regulators at your earliest convenience.

Should you have any questions, please do not hesitate to contact me at Extension 6332.

Sincerely,



Michael C. Butherus
Manager, Major Projects

KLM/djg
Attachments

cc w/: Project Record File MRAP 1.3.5 (thru J. Glasgow)

cc w/o: J. Berwick, DOE-GJO
K. McClellan
Contract File (J. Dearborn)

4-23 (4)

OV III AR 576a



CONTRACT NO.: DE-AC13-96GJ87335
TASK ORDER NO.: MAC02-01
CONTROL NO.: 3100-N/A

MEMO TO: Distribution

FROM: Kristen McClellen *TKB for KLM*

DATE: February 14, 2002

SUBJECT: Extension of Program Directive MSG-01-07

This memorandum is being issued to extend the expiration date of Program Directive MSG-01-07. Due to inclement weather, it has not been possible to conduct the seep sampling during the original time period of the directive (November 19, 2001, through January 31, 2002). Therefore, the subject directive is being extended to April 30.

Should you have any questions, please call me at Extension 6554.

KLM/djg

cc: J. Berwick, DOE-GJO (2)
T. Bartlett
M. Butherus
S. Campbell
F. Pearl
Task Order Managers Directive Log
MSG Administrative Record (Tom Kirkpatrick) (2)
Contract File (J. Dearborn)
Project File MSG01.03.05 (J. Glasgow)
P. Mushovic, EPA (2)
D. Bird, UDEQ (2)